

*Before the*  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Section 73.3555(e)	)	MB Docket No. 13-236
of the Commission's Rules, National	)	
Television Multiple Ownership Rule	)	

To: The Commission

**MOTION FOR EXTENSION OF TIME**

Free Press, Common Cause, Media Alliance and United Church of Christ, Office of Communication, Inc. ("Movants") respectfully request a 14 day extension of time for the deadline to file oppositions and (because of a federal holiday) a 17 day extension for the replies to the Petition for Reconsideration filed in the above-captioned docket. Movants ask that oppositions be due on January 10, 2017, and replies be due January 23, 2017.

Movants recognize that the Commission does not ordinarily grant such extensions, but in this case there is good cause to depart from the general policy. Filing deadlines for filing oppositions and replies to reconsideration petitions are triggered by publication in the Federal Register and thus are not entirely within the control of the Commission. By virtue of the Commission's timely - and appropriate - submission of the matter for publication, the deadline for filing was automatically established as falling on December 27, 2016 (for oppositions) and January 6, 2017 (for replies). It is unlikely that, if the Commission were itself setting the deadlines, it would have chosen dates that coincide with the forthcoming holiday season.

Meeting the current deadlines would needlessly interfere with holiday plans for all affected parties. However, this is not merely a matter of personal convenience; the present schedule would make it difficult for counsel to consult with clients and, therefore, interfere with the development of a complete record for the Commission to consider.

An additional special circumstance is that the deadlines come at a moment of transition for the Commission. It is virtually certain that Commissioner Rosenworcel's service will end on January 3, 2017. Chairman Wheeler has announced that will step down as of January 20, 2017, and his successor will be named by a new President. Even if it were the ordinarily the case that the Commission and staff would begin to decide how to resolve the petition for reconsideration immediately after the filing of replies on January 6, because the Commission is not deciding controversial matters during the current transition period, a two week delay which results in comments being filed on the first working day of the new Chairman's service will not interfere with the administration of this proceeding.

Grant of this motion will also afford time for the United States Court of Appeals to act upon the Commission's pending motion asking that the Court hold in abeyance a petition for review of the order in this docket. While grant of that unopposed motion is quite likely, the additional time requested will provide additional certainty for parties and the Commission.

Wherefore, Movants ask that the Commission extend the filing deadlines for oppositions and replies in this proceeding to January 10, 2017 and January 23, 2017, respectively, and grant all such other relief as may be just and proper.

Respectfully submitted,



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